

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DISTRICT**

RAVON TAYLOR,

Plaintiff,

VS.

NO. _____

ALLSTATE INSURANCE COMPANY,

JURY DEMAND

Defendant.

NOTICE OF REMOVAL

Defendant, ALLSTATE INSURANCE COMPANY, incorrectly styled ALL STATE INSURANCE, hereby notifies the Judges of the United States District Court for the Western District of Tennessee, the clerk of the Chancery Court of Shelby County, Tennessee and Plaintiff, RAVON TAYLOR, that the action described herein and filed in the Chancery Court of Shelby County, Tennessee, is removed to the United States District Court for the Western District of Tennessee, Eastern Division pursuant to 28 U.S.C. § 1441.

1. On December 8, 2015, Plaintiff, RAVON TAYLOR, filed a civil action bearing Docket No. CH-15-1611, Part 1 against the Defendant, ALLSTATE INSURANCE COMPANY, incorrectly styled ALL STATE INSURANCE, in the Chancery Court of Shelby County, Tennessee. Service of the complaint and summons was made upon CT Corporation, the designated statutory agent of the Defendant, on March 3, 2016, by certified mail through the Department of Insurance of the State of Tennessee.

2. This action is filed by Plaintiff for proceeds allegedly due under a contract of insurance written by Defendant, ALLSTATE INSURANCE COMPANY, incorrectly styled ALL STATE, and insuring Plaintiff's real property and contents in Shelby County,

Tennessee which was allegedly destroyed by fire occurring on or about June 11, 2014. Plaintiff also makes claims of violation of the Tennessee Consumer Protection Act.

3. Petitioner seeks removal of this action to this Court upon the grounds that the controversy is wholly between citizens of different states and involves an amount in controversy which exceeds Seventy-five Thousand Dollars (\$75,000.00), exclusive of the interest and costs, 28 U.S.C. § 1332.

4. Plaintiff, RAVON TAYLOR, is a resident and citizen of the State of Tennessee and was a citizen of the State of Tennessee at the time of the filing of this action and at the time of removal. Defendant, ALLSTATE INSURANCE COMPANY, is a corporation incorporated in Illinois, with its principal place of business in Northbrook, Illinois. The amount in controversy exceeds Seventy-Five Thousand Dollars (\$75,000.00), exclusive of interest and costs.

5. This notice is filed within the time prescribed by 28 U.S.C. §1446(b).

6. A copy of the Summons and Complaint, being all the papers served upon the Defendant, is attached hereto.

WHEREFORE, Notice is hereby given that the said civil action number CH-15-1611, Part 1 is removed from the Chancery Court of Shelby County, Tennessee, to this Court.

Respectfully submitted,

RAINEY, KIZER, REVIERE & BELL, P.L.C.

s/ Russell E. Reviere

Russell E. Reviere (BPR No. 07166)

Attorney for Defendant

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was forwarded first class U.S. Mail, postage prepaid to Juliet Hill-Akines, 3900 New Covington Pike, Memphis, Tennessee 38103, counselor of record for Plaintiff, and by electronic means via the Court's electronic filing system.

This the 9th day of March, 2016.

s/ Russell E. Reviere